Judge MARC BARRECA
Place SEATTLE
Date 5/27/11
Time 9:30 a.m.
Response due 5/20/11
Chapter 7

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re: ADAM GROSSMAN, Debtor.	No. 10-19817 **WELLS FARGO BANK'S MOTION FOR RELIEF FROM STAY AND NOTICE THEREOF**

TO: CLERK OF THE COURT
AND TO: THE HONORABLE MARC BARRECA
AND TO: DEBTORS HEREIN AND THEIR ATTORNEYS
AND TO: ALL CREDITORS AND PARTIES IN INTEREST

PLEASE TAKE NOTICE that Wells Fargo Bank's Motion for an Order Granting Relief from Automatic Stay relating to the following real property:

1679 Strauss Lane, Redding, CA 96003

IS SET FOR HEARING as follows:
Judge: Marc Barreca
Place: Seattle
Date: 5/27/11
Time: 9:30 a.m.

IF YOU DO NOT WANT THE COURT TO ORDER THE RELIEF SOUGHT IN THE MOTION STATED ABOVE, THEN YOU OR YOUR ATTORNEY MUST FILE A WRITTEN RESPONSE WITH THE COURT AND SERVE TWO COPIES TO THE JUDGE'S CHAMBERS AND A COPY TO THE UNDERSIGNED BY 5/20/11. If you fail to object to the motion on or before that date, an order granting the relief requested in this motion will be entered without further notice to you. You may file your objection and/or review any documents in support if this motion at:

U.S. BANKRUPTCY COURT CLERK
xxx 700 Stewart Street, Seattle, WA

DATED April 21, 2011.

/s/Bradley B. Jones
BRADLEY B. JONES, WSBA #10732
Attorney for Creditor

BRADLEY BOSWELL JONES, P.S.
ATTORNEY AT LAW
5440 CALIFORNIA AVENUE SW
SEATTLE, WASHINGTON 98136
(206)935-1501

MOTION

Wells Fargo Bank, NA (creditor), through its attorney Bradley Boswell Jones, hereby moves the Court for relief from the automatic stay under Bankruptcy Code Sections 362(d) in order to enforce its security interest in debtor's real property located at 1679 Strauss Lane, Redding, CA 96003, to proceed with repossession, liquidation and/or disbursement of proceeds from sale of the property. It is also requested that the post-order stay of BR 4001(a)(3) be waived and that any order granting relief entered herein be and remain effective notwithstanding any conversion, dismissal and reinstatement or refiling of a subsequent petition within six (6) months of dismissal of this case, absent objection of debtor which is sustained by the court.

In addition, it is requested that the relief from stay grants Creditor permission to communicate with the debtor directly regarding negotiations towards and including completion of a possible future loan modification, short sale or settlement of creditor's claim which may occur during the pendency of this proceeding or following discharge or dismissal.

This Motion is based on the schedules and files herein and on the attached declaration of Wells Fargo Bank's representative, which is incorporated herein by this reference.

DATED April 21, 2011.

/s/Bradley B. Jones
BRADLEY BOSWELL JONES, WSBA #10732
Attorney for Creditor